

MICHAEL A. OLSEN, ESQ.
Nevada Bar No. 6076
THOMAS R. GROVER, ESQ.
Nevada Bar No. 12387
BLACKROCK LEGAL, LLC
10155 W. Twain Ave., Suite 100
Las Vegas, NV 89147
Office: (702) 855-5658
Fax: (702) 869-8243
mike@blackrocklawyers.com
tom@blackrocklawyers.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SARA FOLEY, in her capacity as
Administrator of the Estate of NOEL
MARTINEZ,
Plaintiff,

vs.

WELLS FARGO BANK, N.A.

Defendants.

Case No.: 2:21-cv-01538-RFB-EJY

**STIPULATION TO EXTEND
DEADLINE TO OPPOSE DEFENDANT
WELLS FARGO, N.A.'S MOTION TO
DISMISS COMPLAINT
(FIRST REQUEST)**

Pursuant to LR IA 6-1, Plaintiff SARA FOLEY (hereafter "Plaintiff"), and Defendant WELLS FARGO BANK, N.A. (hereafter "Defendant") stipulate to extend the deadline of Plaintiff's opposition to *Defendant Wells Fargo Bank, N.A.'s Motion to Dismiss Complaint* (hereafter "Motion to Dismiss"). The Motion to Dismiss was filed by Defendant on September 16, 2021. Local Rule IA 6-1(a) provides that a "stipulation to extend time must state the reasons for the extension requested and must inform the court of all previous extensions of the subject deadline the court granted." Plaintiff is seeking an extension due to some health issues that have hampered counsel's ability to formulate the opposition. This is the first request to extend the time to respond to the Motion to Dismiss. Finally, Local Rule IA 6-1(c) requires a stipulation to state "in its opening paragraph the filing date of the subject motion." As previously mentioned, the Motion to Dismiss was filed on September 16, 2021.



Therefore, Plaintiff and Defendant hereby agree and stipulate as follows:

1. Plaintiff's Opposition to *Defendant Wells Fargo Bank, N.A.'s Motion to Dismiss Complain* shall be due on Friday, October 8, 2021; and

2. Thereafter, briefing shall proceed according to LR 7-2.

IT IS SO STIPULATED.

DATED: September 29, 2021

DATED: September 29, 2021

By: /s/ Michael A. Olsen, Esq.
MICHAEL A. OLSEN, ESQ.
Nevada Bar No. 6067
THOMAS R. GROVER, ESQ.
Nevada Bar No. 12387
BLACKROCK LEGAL, LLC
10155 W. Twain Ave., Ste. 100
Las Vegas, NV 89147

By: /s/ Kelly H. Dove, Esq.
KELLY H. DOVE, ESQ.
Nevada Bar No. 10569
TANYA N. LEWIS, ESQ.
Nevada Bar No. 8855
SNELL & WILMER L.L.P.
3883 Howard Hughes Pkwy., Ste. 1100
Las Vegas, NV 89169

IT IS SO ORDERED:



RICHARD F. BOULWARE, II
United States District Judge

DATED this 30th day of September, 2021.



To: Keith Routsong
Subject: Foley V. Wells Fargo

From: Dove, Kelly <kdove@swlaw.com>
Sent: Wednesday, September 29, 2021 9:37 AM
To: Keith Routsong <keith@blackrocklawyers.com>; Lewis, Tanya <tlewis@swlaw.com>
Cc: Thomas Grover <tom@blackrocklawyers.com>
Subject: RE: Foley V. Wells Fargo

Hello Keith,

You may e-sign for me. And it's no problem. We tend to be pretty laid-back about this kind of thing.

Feel better.
Kelly

Kelly H. Dove | Snell & Wilmer L.L.P. | P: (702) 784-5286 | F: (702) 784-5252